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8 (Admitted *pro hac vice*)

9 Attorneys for Defendant

10 Quail Valley Water District

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 HILLCREST INVESTMENTS, LTD., a
14 foreign corporation; HILLCREST
15 PROJECTS, LLC., a foreign limited liability
16 company;

17 Case No. 2:22-cv-00406-RFB-VCF

18 Plaintiffs,

19 v.

20 **STIPULATION AND ORDER TO EXTEND
21 TIME FOR DEFENDANT TO RESPOND TO
22 COMPLAINT
(Fifth Request)**

23 CHICAGO TITLE INSURANCE
24 COMPANY, a foreign entity; QUAIL
25 VALLEY WATER DISTRICT, a foreign
entity; 11239, LLC, a foreign entity;
R.A.M.M. CORP., a Nevada Corporation;

Defendants.

26 Defendant, Quail Valley Water District, (“Defendant”) by and through its counsel of record,
27 Daniel N. Raytis, Esq., of Belden Blaine Raytis, LLP (admitted *pro hac vice*) and Plaintiffs,
Hillcrest Investments, Ltd. and Hillcrest Projects, LLC (“Plaintiffs”), by and through their counsel
of record, Mitchell S. Bisson, Esq., hereby jointly submit this stipulation and order to extend
Defendant’s deadline to file its response to the Complaint (ECF No. 1, served on April 20, 2022),
to thirty (30) days after entry of this Order.

28 Defendant is an out-of-state entity. Defendant’s counsel was permitted to appear *pro hac
vice* in this matter by an Order of the Court on June 15, 2022.

1 This is the Parties' fifth joint request for an extension of this deadline and is not intended to
2 cause any delay or prejudice to any party to this action. The Parties are currently in the process of
3 attempting resolve this action prior to the filing of a responsive pleading. As such, the Parties
4 request this extension in order to provide Defendant with additional time to obtain documents,
5 materials and information relevant to Plaintiff's claims alleged against Defendant in order to
6 respond to the Complaint and/or discuss resolution of the same. The extension would also result in
7 significant saving of time, costs, and fees should resolution be reached, as well as promote
8 efficiency and judicial economy.

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10 Dated: October 18, 2022

BELDEN BLAINE RAYTIS, LLP

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By: /s/Daniel N. Raytis
DANIEL N. RAYTIS
Attorneys for Defendant Quail Valley
Water District

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15 Dated: October 18, 2022

THE LAW OFFICES OF MITCHELL
S. BISSON

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By: /s/Mitchell S. Bisson
MITCHELL S. BISSON, ESQ.
Attorney for Plaintiffs

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ORDER

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Based upon the stipulation of the parties, and good cause appearing,

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IT IS SO ORDERED.

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Dated this 19th day of October, 2022.

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UNITED STATES MAGISTRATE JUDGE
Case No. 2:22-cv-00406-RFB-VCF

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1 Case No. 22:cv-00406

2 **PROOF OF SERVICE**

3 STATE OF CALIFORNIA, COUNTY OF KERN

4 I am employed in the County of Kern, State of California. I am over the age of eighteen
years and not a party to the within action; my business address is 5016 California Ave., Suite 3,
Bakersfield, CA 93309. My email address is heather@bbr.law.

5 On **October 18, 2022**, I served the following document(s) described as

6 on the interested parties in this action via electronic service through the Court's Electronic
7 File/Service Program.

Mitchell S. Bisson, Esq. Law Office of Mitchell S. Bisson 911 N. Buffalo Drive, Suite 201 Las Vegas, NV 89128 mbisson@bissonlegal.com	Attorney for Plaintiffs Hillcrest Investments, LTD
Natalie C. Lehman, Esq. Fidelity National Law Group 8363 W. Sunset Road, Ste. 120 Las Vegas, NV 89113 Natalie.lehman@fnf.com	Attorneys for Defendant Chicago Title Insurance Company

14 Executed on **October 18, 2022**, at Bakersfield, California.

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is
16 true and correct.

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18 Heather McCoy

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